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April 23, 2015

Ms. Maureen Benitz
Senior Campaign Finance & Reviewing Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

Re: Special Operations for America ("SOFA"): Identification#: C00523241

REFERENCE: 30 DAY POST-GENERAL REPORT (10/16/2014 - 11/24/2014)

Dear Ms. Benitz,

Thank you for the opportunity to respond to the Commission's letter dated March 24, 2015. The Commission requested additional information regarding two items.

1. The Commission requested additional information regarding the employers and occupations of several donors. This correspondence is to further articulate that SOFA has actively tried to acquire and report each contributor's name, address, and employer/occupation information.

SOFA meets the guidelines of 11 CFR 104.7. Specifically, SOFA undertakes the following actions:

I. SOFA's original solicitation includes a clear and conspicuous request for the contributor information and informs the contributor of the requirements of federal law for the reporting of such information.

II. When such information was not provided, SOFA made at least one follow-up, stand-alone effort to obtain said information.

III. The follow-up effort occurred before 30-days after receipt of the contribution and was in the form of a request via mail, e-mail, or telephone call documented in writing. Said requests included the following:

a. An inquiry for the missing information, without soliciting a contribution.

b. Notification to the contributor that the requirements of federal law for the reporting of contributor information.

c. Also, SOFA includes a pre-addressed return envelope.

IV. When SOFA receives contributor information after the contribution(s) has been reported, SOFA files an amendment to the original report disclosing the information.

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2. The Commission requested additional information regarding Schedule E where the Committee may have failed to file or timely file one or more of the required 24-hour report(s) for independent expenditures. Regarding the independent expenditures identified as missing in the RFAI, the Committee was not required to file these as 24 hour reports since those expenditures did not meet the \$1,000 threshold. Regarding the independent expenditures identified as late in the RFAI, given the unique nature of online advertising, these expenditures were reported as soon as an ascertainable value was available. These expenditures were all reported either before or on the election for the public to review. Additionally, the Commission requested additional information regarding payments for Direct Mail Printing & Postage and Media Production appearing on Schedule B supporting Line 21(b). These payments were not for a public communication that referred to a clearly identified candidate for Federal office.

This should answer the Commission's inquiry. Please feel free to contact us if you have any further questions.

Sincerely

Kaarlo Hietala
Treasurer
